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**CIVIL DIVISION**  
State Bar No. 001565  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MONICA CURTIS, an Individual ,  
Plaintiff,

vs.

THE JUSTICE COURT OF THE  
NORTH LAS VEGAS TOWNSHIP,  
CLARK COUNTY, STATE OF  
NEVADA,  
Defendant.

Case No: 2:20-cv-02354-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT'S TIME TO  
RESPOND TO COMPLAINT**

**[FIRST REQUEST]**

Plaintiff Monica Curtis ("Plaintiff"), by and through her attorney of record, Jenny L. Foley, PhD, of HKM EMPLOYMENT ATTORNEYS LLP, and Defendant North Las Vegas Township Justice Court ("Defendant"), by Steven B. Wolfson, District Attorney, through Jeffrey S. Rogan, Deputy District Attorney, hereby stipulate and agree as follows:

1. Plaintiff filed her Complaint [ECF No. 1] on December 30, 2020;
2. Defendant was served on January 6, 2021, making Defendant's response to the Complaint due January 27, 2021;
3. The parties stipulate and agree to extend Defendant's deadline to answer or otherwise respond to the Complaint by eight (8) days, up to and including Thursday, February 4, 2021;

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- 1 4. The purpose of this extension is to provide time for Plaintiff and  
2 Defendant to review legal authority regarding the applicability of Eleventh  
3 Amendment immunity to Nevada Justice Courts. This extension will  
4 conserve the Court's and parties' resources by possibly precluding the  
5 need for a Motion to Dismiss.
- 6 5. This is the first request for an extension of Defendant's deadline to  
7 answer or otherwise respond to the Complaint, and the extension is not  
8 being sought for improper purposes or delay.
- 9 6. In view of the foregoing, the parties respectfully request the Court to  
10 extend Defendant's time to respond to the Complaint by eight (8) days,  
11 up to and including February 4, 2021.

12  
13 DATED this 27th day of January 2021.

14  
15 By: /s/ Jenny L. Foley

16 Jenny L. Foley, Ph.D., Esq.  
17 Nevada Bar No. 009017  
18 HKM Employment Attorneys LLP  
19 1785 East Sahara, Suite 300  
20 Las Vegas, Nevada 89104  
21 Attorney for Plaintiff

By: /s/ Jeffrey S. Rogan

Jeffrey S. Rogan, Esq.  
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**ORDER**

IT IS SO ORDERED, this 28th day of January 2021.

  
United States Magistrate Judge